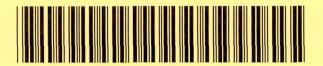
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DocumentID

NONCD0002891

Site Name

GOLDSBORO MILLING-MILL #1 & #2

DocumentType

Correspondence (C)

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Division

WASTE MANAGEMENT

Section

SUPERFUND

Program

IHS (IHS)

DocCat

FACILITY



North Carolina Department of Environment and Natural Resources

Division of Waste Management

Beverly Eaves Perdue Governor Dexter R. Matthews

Dee Freeman Secretary

CERTIFIED MAIL

October 4, 2012

Mr. John Pike Goldsboro Milling Mill 938 Millers Chapel Road Goldsboro, NC 27534

Re:

NOTICE OF REC PROGRAM ELIGIBILITY

Goldsboro Milling Mill #1 Goldsboro, Wayne Co., NC NONCD0002891

Dear Mr. Pike:

Thank you for submitting the Site Cleanup Checklist/Questionnaire (Questionnaire) for the above subject site (Site). The Inactive Hazardous Sites Branch (Branch) has completed review of the Questionnaire and determined that the Site can be cleaned up through the Registered Environmental Consultant (REC) Program without direct oversight by Branch Staff.

Note that, if you have not already done so, you must take the initial abatement actions required under 15A NCAC 2L. Pursuant to 15A NCAC 2L .0106(b), any person conducting or controlling an activity which results in the discharge of a waste or hazardous substance to the groundwaters of the State, or in proximity thereto, shall take immediate action to terminate and control the discharge, and mitigate any hazards resulting from exposure to the pollutants. Pursuant to 15A NCAC 2L .0106(c), if groundwater standards have been exceeded, you must take immediate action to eliminate the source or sources of contamination. Beyond initial abatement actions, all assessment and remediation will be done through the Inactive Hazardous Sites Response Act (IHSRA).

Under the IHSRA, to receive approval of the assessment and clean up at the Site, you must enter into an administrative agreement with the Branch. Since the Branch has determined that the Site can be cleaned up through the REC Program, execution of an REC-Administrative Agreement (REC-AA) is required. The procedures for entering into an REC-AA are attached. If you have any questions regarding these procedures or the REC Program, please contact the REC Program Manager, Kim Caulk, at (919 707-8350 or visit the REC Program website at http://portal.ncdenr.org/web/wm/sf/ihs/recprogram.

If we do not receive a response from you within the next 60 days indicating your willingness to enter an REC-AA, the Branch will take further action to prioritize the Site. Failure to take the initial abatement steps required in 15A NCAC 2L may result in the assessment of a civil penalty against you. In addition, the Branch may seek



an injunction compelling compliance with the initial abatement steps required in 15A NCAC 2L. For future work beyond the initial abatement steps required pursuant to 15A NCAC 2L, a unilateral Order may be issued pursuant to N.C.G.S. 130A-310.3 to compel assessment and cleanup. In addition, if you choose not to conduct a cleanup voluntarily, the site may be referred to the United States Environmental Protection Agency (EPA). If so referred, EPA will screen the site for Federal enforcement action under the Federal Superfund Program, established under the Comprehensive Environmental Responsibility, Compensation, and Liability Act.

If you have additional questions about the requirements that apply to your site, please contact me at (919) 707-8355.

Sincerely,

Keith Snavely, Hydrogeologist Inactive Hazardous Sites Branch

Superfund Section

Enclosure: REC-AA procedures

cc: Mr. K. Allen McColl, Jr., Terracon

Procedures for Obtaining a REC Administrative Agreement

To obtain a Registered Environmental Consultant (REC)-Administrative Agreement (AA), remediating parties (RPs) and RECs should use the following procedures:

- 1. Contact Kim Caulk, preferably by e-mail at <u>Kim.Caulk@NCDENR.gov</u>, and provide the following information for the site:
 - Site name, street address/location, city, and county;
 - Exact name of remediator;
 - Name, title, telephone number, e-mail address, & mailing address of the highest ranking official of the remediating party having day-to-day responsibility for the performance of the remedial response action;
 - Name, title, telephone number, e-mail address, & mailing address of any other contact person(s) and the proposed REC (if known) for the remedial response action;
 - Current property owner of the site.
- 2. Using the information above, a draft REC-AA will be prepared by the Branch and forwarded, preferably by e-mail, to the RP and any other specified representatives for review. The draft electronic version of the AA will be maintained by the Branch.
- 3. After the RP and/or REC confirms the information is satisfactory, the AA will be finalized by the Branch and an original, hardcopy of the final document will be mailed to the RP for signature. The RP should then mail the signed <u>original</u>, final AA to the REC for signature. The document should then be returned by mail to the Branch for execution. The Branch will forward a photocopy of the AA to the RP and REC following execution.
- 4. Before the AA can be executed, the following requirements must be completed:
 - A 30-day public notice for the proposed AA must be performed by the Branch in accordance with 130A-310.9(b). Note that this includes sites already undergoing groundwater remediation and previously under the oversight of the Division of Water Quality. To complete the required 30-day public notice, the proposed REC and/or the Remediating Party will need to submit, preferably by e-mail, a site location map (typically a tax map or parcel map) and the mailing addresses for each of the adjacent surrounding property owners. The reference/source of the submitted information should be included;
 - Pursuant to 15A NCAC 13C .0307(c), to participate in the REC Program, payment of a financial assurance fee must be received by the Branch. The fee for entry of the site into the REC Program is \$2500. Checks should be made payable to NC Division of Waste Management and referenced to the REC Trust Fund. There will be a similar fee each year until remediation at the site is complete. The annual administration fee, which is to help offset the costs of the Division's audits of remedial actions, is based on the number of sites in the REC Program and in recent years has varied from approx. \$1800 to \$2500.

The required public notice can begin while the AA is reviewed/finalized and the fees are processed.

Questions regarding these procedures and the REC Program should be directed to Kim Caulk at (919) 707-8350 or Kim.Caulk@NCDENR.gov.

From:

Snavely, Keith

Sent:

Wednesday, September 19, 2012 1:53 PM

To:

'kamccoll@terracon.com'

Subject:

No need to send me a bound copy of the Goldsboro Milling site groundwater sampling

Allen,

Thanks for the report. Since we are loading documents electronically into our public access database ("CARA"), the pdf you sent me for this report is sufficient. I don't need a hard copy of the data. I will review it and get back with you mostly like the first of next week.

Thanks, Keith

Keith Snavely, Hydrogeologist Inactive Hazardous Sites Branch NC Division of Waste Management

Office #:

(919) 707- 8355

Fax#:

(919) 707-8355

email:

Keith.Snavely@ncdenr.gov

Address: Green Square Complex

DENR Office Building 217 West Jones Street

Office 3212-E Raleigh, NC 27603

1646 Mail Service Center

Raleigh, NC 27699

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1646 Mail Service Center Raleigh, NC 27699

Email correspondence to and from this sender is subject to the NC Public Records Law and may be disclosed to third parties

From: Sent:

McColl Jr., K. Allen [kamccoll@terracon.com] Wednesday, September 19, 2012 11:39 AM

To:

Snavely, Keith

Cc: Subject: john.pike@goldsboromilling.com

Goldsboro Milling Company Lmited Supply Well Sampling Report

Attachments:

72127088 Goldsboro Milling Limited Supply Well Sampling Report esig.pdf

Hello Keith,

Please find attached an electronic copy of the Limited Water Supply Well Sampling Report for the sampling of the Water Supply Well #4 at Goldsboro Milling's Mill 1 and the supply well at the Night Manager's Residence that you requested. Solvents were not detected in either well at this time. Also, other petroleum based constituents were non detect. The only thing that was analyzed were a few metals that were under NCDENR's 2L standards.

Please review the report when you get a chance and let me know if you have questions. I will also mail you out a bound copy of the report.

Thanks,

K. Allen McColl, Jr.

Staff Professional / Environmental Services Terracon 314 Beacon Drive I Winterville, NC 28590 P (252) 353 1600 I F (252) 353 0002 I M (252) 341 5480 kamccoll@terracon.com I terracon.com

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----Original Message----

From: Snavely, Keith [mailto:keith.snavely@ncdenr.gov]

Sent: Thursday, August 30, 2012 4:51 PM

To: McColl Jr., K. Allen

Cc: john.pike@goldsboromilling.com

Subject: RE: Site Cleanup Ouestionnaire- Goldsboro Milling Company Mill 1 and Mill 2

Allen,

Go ahead and sample both the supply well #4 and the night managers well for the complete scan VOCs , SVOCs and metals (8260, 8270 and the 14 metals). That will provide us with the most updated groundwater results for the water supply wells. Please provide well depths and well construction info, if known, for both wells.

As far as the report goes, one letter report will be sufficient to report the sample results from both these wells.

Keith

----Original Message----

From: McColl Jr., K. Allen [mailto:kamccoll@terracon.com]

Sent: Thursday, August 30, 2012 4:40 PM

To: Snavely, Keith

Subject: RE: Site Cleanup Questionnaire- Goldsboro Milling Company Mill 1 and Mill 2

Hello Keith,

Good talking to you yesterday and today. John Pike and I talked about the supply well sampling earlier today after you sent the email. John would like us to get going on it.

Did you want us to go ahead and sample Supply Well 4 while we are out sampling the night manager's well? I guess we sampled Supply Well 4 for 8260 during some of the initial sampling end of last year and PCE was in this well too. If you need us to resample Supply Well 4, do you want me to analyze for 8260, 8270 and the 14 metals as we are going to do for the night manager's well? It would just save Goldsboro Milling a little extra in the long run for us to go ahead and sample Supply well 4 while we are doing the night manager's well so that we wouldn't have to make an extra trip back to sample.

Also, would a letter type report be sufficient to report our findings or do you have another report format in mind you would like us to put together?

Just let me know so that I know how to submit a cost proposal to John.

Thanks,

K. Allen McColl, Jr.
Staff Professional / Environmental Services Terracon
314 Beacon Drive I Winterville, NC 28590 P (252) 353 1600 I F (252) 353 0002 I M (252) 341
5480 kamccoll@terracon.com I terracon.com

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b Please consider the environment before printing this email ü

----Original Message----

From: Snavely, Keith [mailto:keith.snavely@ncdenr.gov]

Sent: Thursday, August 30, 2012 12:58 PM

To: john.pike@goldsboromilling.com; McColl Jr., K. Allen

Cc: Walch, John

Subject: Site Cleanup Questionnaire- Goldsboro Milling Company Mill 1 and Mill 2

Mr. Pike,

I have reviewed the Site Cleanup Questionnaire for the Goldsboro Milling Company Mill 1 and Mill 2 site located at 938 Millers Chapel Rd in Goldsboro, Wayne County that was received in our office on August 23, 2012. A review of Terracon's December 28, 2011 Limited Solvent Investigation Services Report attached to the questionnaire indicates that a groundwater plume of PCE, TCE and its daughter products exist on the property of Mill 1. The plume has extended to the property of Mill 2 as detected above the 2L groundwater standard for PCE in monitoring well MW-6. Since the night managers residence water supply well is downgradient from the suspected source area, the Inactive Hazardous Sites Branch (Branch) is requesting Goldsboro Milling sample the well at this residence.

We need this information to make our final determination with regards to the Site Cleanup Questionnaire and the Sites eligibility for a Voluntary Cleanup under the Registered Environmental Consulting Program.

Please sample the night managers water supply well for Volatile Organic Compounds, Semi-Volatile Organic Compounds by US EPA Methods 8260 and 8270, respectively, and the 14 hazardous substance metals: antimony, arsenic, beryllium, cadmium, chromium, copper, lead, manganese, mercury, nickel, selenium, silver, thallium and zinc. Also, if possible, provide well depth and construction details of this water supply well.

I also spoke with Allen McColl of Terracon about this possible sampling. The Branch will also send you a Health Risk Evaluation (HRE) for the contaminants noted for water supply well #4 on the Mill 1 property. I realize that well is not a potable well, however our toxicologists are still required to follow-up any affected water supply wells with a HRE and provide that evaluation to the owner of the well.

If you have any questions, I can be reached at (919)707-8355.

Keith Snavely

Keith Snavely, Hydrogeologist Inactive Hazardous Sites Branch NC Division of Waste Management

Office #:

(919) 707- 8355

Fax#:

(919) 707-8355

email:

Keith.Snavely@ncdenr.gov

Address: Green Square Complex

DENR Office Building 217 West Jones Street Office 3212-E

Raleigh, NC 27603

1646 Mail Service Center Raleigh, NC 27699

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Private and confidential as detailed here (www.terracon.com/disclaimer). If you cannot access hyperlink, please e-mail sender.

Print Form	

Staff Name: Kersh Snavely

Inactive Hazardous Sites Tracking Data Entry

Always enter ID# and site	name. Otherwise, only Site Name	Goldsboro N	ormation/cho	anges. ny Mill 1 and Mill 2	_
	Site Name Site City:	Goldsboro			_
Site Address: 938 Millers Chapel Road	Site Count	v: Wayne			_
Process Code:	Residence on Si		⊠ No		_
Distance to Nearest Water Source Well	: > 1/4 mile	No Inform	nation 🗌	< 1/4 mile	\boxtimes
Distance to SW Intake (Drinking):	> 1/4 mile 🔲	No Inform	nation 🗵	< 1/4 mile	
Coordinates: Latitude:		_ Longitude	:		
Geolocation Method: Registered Land Surveyor GPS Survey Grade Correcte GPS Survey Grade Not Corr GPS Mapping Grade Correct GPS Mapping Grade Not Corr GPS Recreational Grade Inventory Categories: (*If "Yes," site can	ected [ted [prrected [☐ Hard Co ☐ Geocod ☐ Supplied ☐ Unknow	py Map ing (addres d by others	nent on Georeferens ss match) (unsubstantiated	
			egories only if ag	ency addressing all site con	tamination.
SPL*	PRE	Solid Was Non-NPL NPL RCRA No TSD	ite Lead EPA Supe n-TSD Lea	rfund/DOD Lead	
Non-HS Site - Open Non-HS Site - NFA Non-HS Site - NFA Restricted Use		DRP Lead DSCA Lead UST Lead DWQ Lead Duplicate	ad I		
Contaminant Data: (Based on laboratory d	letection.)	<u></u>			
	Groundwater	Soil Soil	<u>Surfa</u>	ce Water	Sediment
Known/suspected Contamination (Check	only if no lab data)				

From:

McColl Jr., K. Allen [kamccoll@terracon.com]

Sent:

Thursday, August 30, 2012 4:40 PM

To:

Snavely, Keith

Subject:

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Just let me know so that I know how to submit a cost proposal to John.

Thanks,

K. Allen McColl, Jr.

Staff Professional / Environmental Services Terracon
314 Beacon Drive I Winterville, NC 28590 P (252) 353 1600 I F (252) 353 0002 I M (252) 341
5480 kamccoll@terracon.com I terracon.com

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b Please consider the environment before printing this email ü

----Original Message----

From: Snavely, Keith [mailto:keith.snavely@ncdenr.gov]

Sent: Thursday, August 30, 2012 12:58 PM

To: john.pike@goldsboromilling.com; McColl Jr., K. Allen

Cc: Walch, John

Subject: Site Cleanup Questionnaire- Goldsboro Milling Company Mill 1 and Mill 2

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If you have any questions, I can be reached at (919)707-8355.

Keith Snavely

Keith Snavely, Hydrogeologist Inactive Hazardous Sites Branch NC Division of Waste Management

Office #: (919) 707- 8355 Fax#: (919) 707-8355

email: Keith.Snavely@ncdenr.gov

Address: Green Square Complex

DENR Office Building 217 West Jones Street

Office 3212-E Raleigh, NC 27603

1646 Mail Service Center

Raleigh, NC 27699

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From:

Snavely, Keith

Sent:

Thursday, August 30, 2012 12:58 PM

To:

'john.pike@goldsboromilling.com'; 'kamccoll@terracon.com'

Cc:

Walch, John

Subject:

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Keith Snavely

Keith Snavely, Hydrogeologist Inactive Hazardous Sites Branch NC Division of Waste Management

Office #:

(919) 707- 8355

Fax#:

(919) 707-8355

email:

Keith.Snavely@ncdenr.gov

Address: Green Square Complex

DENR Office Building 217 West Jones Street

Office 3212-E Raleigh, NC 27603



August 15, 2012

Mr. Keith Snavely Inactive Hazardous Sites Branch Division of Waste Management 1646 Mail Service Center Raleigh, NC 27699-1646

Subject:

Site Cleanup Questionnaire and

Report of Limited Solvent Investigation Services

Goldsboro Milling Feed Mill # 1

938 Millers Chapel Rd.

Goldsboro, Wayne County, North Carolina

Terracon Project No: 72117095

Dear Mr. Snavely:

Terracon Consultants, Inc. (Terracon) has been requested by Goldsboro Milling Company to submit the attached Site Cleanup Questionnaire and Report of Limited Solvent Investigation Services for your review. Goldsboro Milling Company representatives completed the questionnaire under our guidance.

Please let me know if you have questions. I can be reached at 252-353-1600 or by electronic mail at kamccoll@terracon.com.

Thanks.

Terracon Consultants, Inc.



Staff Professional

Environmental Services.



Site Cleanup Questionnaire

Remediating parties interested in volunteering should prepare this form with the assistance of an environmental consultant. All cooperative parties are eligible for Branch-approved remedial actions. Answer all questions, based on current information, and provide writtendescriptions where needed.

NCDE	NR Site Name, City and County Goldsboro Milling Company - Mill 1 and Mill 2, Goldsboro,	Way	/ne	
1.	Is the site located on or immediately adjacent to residential property, schools, day-care centers or other sensitive populations?		Υ	ΣN
	If yes, please explain on a separate page.			
2.	What is the distance (from site property line) to the nearest residence, school or day-care center? Please attach a map showing the site and nearest residence, school or daycare center.		Onsi	te
3.	Is the site completely surrounded by a locked fence? If no, please explain security measures at the site on a separate page.		Y	X N
4.	Are site surface soils known to be contaminated?	×	Υ	□и
	If yes, or unknown, describe briefly on a separate page.			
5.	Is site groundwater known to be contaminated?	X	Υ	□и
	If yes, or unknown, describe briefly on a separate page.			
6.	Is site sediment or surface water known to be contaminated?		Υ	X N
	If yes, or unknown, describe briefly on a separate page.			
7.	Has groundwater contamination affected any drinking water wells?		Υ	X N
	If yes, or unknown, please explain on a separate page.			
8.	What is the distance to the nearest downgradient drinking water well?		>1500	feet
9.	What is the distance to the nearest downstream surface water intake?		450 fe	eet
10 .	Are hazardous vapors, air emissions or contaminated dust migrating into occupied residential, commercial or industrial areas?		Υ	X N
	If yes, or unknown, please explain on a separate page.			
11.	Have hazardous substances known to have migrated off property at concentrations in excess of Branch unrestricted-use remediation goals?		Υ	X N
	If yes, or unknown, please explain on a separate page.			
12.	Has the local community expressed concerns about contamination at the site?		Υ	X N
	If yes, or unknown, please explain on a separate page.			
13.	Based on current information, are there any sensitive environments located on the property (sensitive environments are identified in the Remedial Investigation Work Plans section of the IHSB " Guidelines for Assessment and Cleanup" at http://portal.ncdenr.org/web/wm/sf/sfavailabledocs)?		Υ	⊠ N

If yes, or unknown, please explain on a separate page.

14. Based on current information, has contamination from the site migrated into any sensitive environments?	□ Y	×Ν
If yes, or unknown, please explain on a separate page.		
15. Do site contaminants include radioactive or mixed radioactive and chemical wastes? If yes, or unknown, please explain on a separate page.	□ Y	X N
Remediating Party Certification Statement After first being duly sworn or affirmed, I,	pelief, and, to accurate and	o d
(Signature of Remediating Party Representative) Tohn Pike Dik. of Operations (Printed Name and Title of Remediating Party Representative) (Printed Name of Company)		
STATE OF	nt of said ow contained in	mer
WITNESS my hand and official seal the 10 th day of August, 200-2.012 Dunce T. Parker Notary Public (signature) (OFFICIAL SEAT	NOTARY PUBLIC	W. C. S.
My commission expires: $\frac{\lambda - 5 - 14}{2}$	We COUNT	THERE'S

Environmental Consultant Certification Statement

After first being duly sworn or affirmed, I, CARLE BON over the age of eighteen, I am competent to make this certificate belief, and, to the best of my knowledge and belief, after thorous accurate and complete. I am aware that there are significant or incomplete information.	ation based upon my own personal knowledge and ugh investigation, the information contained herein
Care F Borno (Signature)	8-13-201Z (Date)
(Signature)	(Date)
CARL F BONNER (Printed Name)	-
TERRAGA COASUTAATS IAC (Printed Name of Environmental Consultant)	-
STATE OF	
certify that	estigation, the information contained in the above
WITNESS my hand and official seal the 13th day of	4 c g u s t , 20 / 2 .
My commission expires: June 6, 2015	(OFFICIAL SEAL)

IHSB Site Cleanup Questionnaire Addendum

Goldsboro Milling Company-Mill #1 and Mill #2 938 Millers Chapel Road Goldsboro, North Carolina (Wayne County)

Background

The site is located in a rural area of Goldsboro, NC. It is leased by Goldsboro Milling Company, a large grain mill operation. The site currently includes Goldsboro Milling's main office, large grain storage buildings and other structures used in processing grain/feed for animals. The Goldsboro Milling operation consists of approximately 37 total acres that are broken up into multiple contiguous tracts. The two tracts of property that are currently known to contain solvent contamination are referred to as Mill #1 and Mill #2. Mill #1 consists of approximately 8 acres and is a portion of Parcel ID Number 3538186927. Mill #2 consists of approximately 29 acres and is Parcel ID Number 3528988906. The area impacted by solvent contamination is limited to approximately one acre or less.

Supplemental Response to Question No. 1:

The site is bounded by Millers Chapel Rd., undeveloped woodland and additional commercial properties leased by Goldsboro Milling Company (including Mill # 3 and the truck fleet maintenance shop) to the west; Goldsboro Milling's Main Office and Goldsboro Milling's Shavings Operations to the north; Goldsboro Milling's research farm and undeveloped woodland owned by Goldsboro Milling to the east; and undeveloped woodled land, an agricultural field and a water tower to the south. A railroad spur owned by the North Carolina Railroad extends between Mill # 1 and Mill # 2. Goldsboro Milling's Night Manager's residence is located on property leased by Goldsboro Milling and is approximately 500 feet to the southwest of the impacted area. The closest off-site residence appears to be located approximately 2500 feet to the northeast from the impacted area and is located approximately 1500 feet north from Goldsboro Milling's Mill # 1 property line.

Supplemental Response to Question No. 2:

There is an on-site residence for the night manager located on the Mill #2 property.

Supplemental Response to Question No. 3:

Goldsboro Milling does not currently have locked fences and generally operates on a 24-hour schedule. After normal business hours (i.e., after 5 pm daily), access to the site is limited to one entrance off Millers Chapel Rd. Goldsboro Milling employs a security guard at night to provide security for the site.

Supplemental Response to Question No. 4:

See attached Limited Solvent Investigation Services Report dated December 28, 2011 from Terracon Consultants, Inc. for detailed information about soil sampling results.

Supplemental Response to Question No. 5:

Based on analytical results from groundwater samples collected in October and November of 2011, concentrations of solvents (including PCE and TCE) and petroleum-based constituents are

above NCDENR's Groundwater Quality Standards. A Limited Site Investigation report by Terracon Consultants, Inc. dated November 8, 2011 has been submitted to NCDENR for review. A Limited Solvent Investigation Services Report dated December 28, 2011 is enclosed with this addendum. Based on these reports, Goldsboro Milling has defined the extent of the solvent plume. The source of the solvents is still presently unknown, but appears to be associated with potential truck washing during truck fueling and/or potential equipment cleaning chemicals used in association with the feed lab.

Supplemental Response to Question No. 7:

A water supply well is located near the night manager's residence on the Mill #2 property. The well has been used to provide potable water to the residence. Although no samples have been collected from the well, there is no information showing that the well has been impacted. As a result of this investigation, bottled water is now provided to the night manager's residence.

Supplemental Response to Question No. 8:

In addition to the night manager's well, nine other water supply wells were identified within 1500 feet of the source area. These nine wells are used for truck washing, filling the pond at the main office building, or as water supplies for the site's grain/hatchery processes. None of the nine onsite water supply wells is used for drinking water.

Based on previous environmental investigations, off-site water supply wells (including drinking water and irrigation wells) have not been identified within 1500 feet of the impacted area. Based on site reconnaissance, it appears that the above-mentioned closest off-site residence contains a water supply well. It is unknown whether this well is currently in use or if this residence utilizes public water.

Supplemental Response to Question No. 9:

A review of the topographic map indicates the area of the release is generally flat and gently slopes to the west towards a "blue line stream" that appears to be an unnamed tributary of Walnut Creek. This "blue line stream" is located approximately 1300 feet west of the known release location. A decorative pond is located onsite near the main building and is approximately 450 feet north of the release area. Ditches containing intermittent surface water are located along Millers Chapel Rd. and along portions of the southern property line of Mill # 2. These apparent surface water bodies are located approximately 450 feet from the impacted area. Groundwater flow direction at the site was determined to be towards the southwest.